

# **Exhibit 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

ZAGG INC.,

Case No. 1:23-cv-20304-RKA

Plaintiffs,

v.

TX TRADING INC. et. al.

Defendants.

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**RESPONSE OF STOUT RISIUS ROSS, LLC. TO MAY 18, 2023  
SUBPOENA ISSUED BY DVG TRADE LLC.**

Non-Party Stout Risius Ross, LLC (“Stout”), by and through its counsel, Clark Hill PLC, for its Response to Requests for Production of Documents to the May 18, 2023 Subpoena To Produce Documents, Information, Or Objects Or To Permit Inspection of Premises In a Civil Action (“Subpoena”) of DVG Trade LLC (“DVG”), states as follows:

**DOCUMENTS REQUESTED**

1. Documents sufficient to identify Stout’s relationship with Screenya.

**Response:** Stout does not have any responsive documents.

2. Documents sufficient to identify Screenya’s relationship with Stout, Stout Risius Ross Advisors, LLC, and/or Stout Risius Ross Valuation Consultants, Inc.

**Response:** Stout does not have any responsive documents.

3. Documents sufficient to identify all businesses operating out of the address 150 W. Second Street, Suite 400, Royal Oak, MI 48067.

**Response:** See attached Sublease agreement between Stout Risius Ross, LLC and Zagg, Inc., Bates Document SRR\_000004.

4. All Documents and Communications relating to Screenya

**Response:** Stout does not have any responsive documents.

5. All Documents and Communications relating to the ownership of Screenya.

**Response:** Stout does not have any responsive documents.

6. All Documents and Communications relating to the change of the “Business Address” associated with the Screenya Storefront in May 2023.

**Response:** Stout does not have any responsive documents.

7. Documents sufficient to identify every Person who owns or operates the Screenya Storefront, including each Person’s name, email address, mailing address, and telephone number.

**Response:** Stout does not have any responsive documents.

8. All Documents and Communications relating to the sale of ZAGG Products on the Screenya Storefront, including on the ZAGG listings.

**Response:** Stout does not have any responsive documents.

9. All Documents and Communications relating to Defendant and/or Mac N’ Cheese Storefront.

**Response:** Stout does not have any responsive documents.

10. All Documents and Communications relating to the ZAGG Listings.

**Response:** Stout does not have any responsive documents.

11. All Communications between You and Zagg.

**Response:** See Email Communications between Stout and Zagg, Inc. October 6, 2022 through May 13, 2023, Bates Document SRR\_000001 through SRR\_000693.

Stout has redacted its EIN on Bates Document SRR\_000271 and SRR\_000277.

Stout has also redacted its bank account information on Bates Document SRR\_000045, SRR\_000268, SRR\_000270, SRR\_000274, and SRR\_000276.

12. All Communications between You and Screenya.

**Response:** Stout does not have any responsive documents.

13. All Communications between You and Longmore.

**Response:** Stout does not have any responsive documents.

14. All Communications between You and Buckner.

**Response:** Stout does not have any responsive documents.

15. All correspondence to or from the Zagg E-mail Address.

**Response:** Stout does not have any responsive documents.

16. Documents sufficient to identify the name of every financial institution in which You deposit payments from Screenya.

**Response:** Stout does not have any responsive documents.

17. Documents sufficient to identify the name of every financial institution to which You sent payments to Screenya.

**Response:** Stout does not have any responsive documents.

18. All Documents relating to efforts by Zagg and/or Screenya concerning pricing for ZAGG Products on Amazon.

**Response:** Stout does not have any responsive documents.

19. All Documents relating to efforts by Zagg and/or Screenya to submit intellectual property and authenticity claims to Amazon.

**Response:** Stout does not have any responsive documents.

20. All Documents relating to remedial measures taken by Amazon against Zagg and/or Screenya in connection with violations of Amazon policies.

**Response:** Stout does not have any responsive documents.

Respectfully submitted,

CLARK HILL PLC

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*Attorney for Stout Risius Ross, LLC (Non-Party)*

Dated: June 6, 2023